

# **Exhibit 6**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SHARONELL FULTON, CECELIA  
PAUL, TONI LYNN SIMMS-BUSCH,  
and CATHOLIC SOCIAL SERVICES,

*Plaintiffs,*

v.

CITY OF PHILADELPHIA,  
DEPARTMENT OF HUMAN  
SERVICES FOR THE CITY OF  
PHILADELPHIA, and  
PHILADELPHIA COMMISSION ON  
HUMAN RELATIONS,

*Defendants.*

Civil Action No. 18-cv-2075

Assigned to the Honorable  
Judge Tucker

**DECLARATION OF TONI LYNN SIMMS-BUSCH**

1. My name is Toni Lynn Simms-Busch. I am over the age of 21 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or been convicted of a crime of dishonesty. I have personal knowledge of all of the contents of this declaration.

2. I previously worked as a foster care social worker with a private agency, and then later as a child advocate social worker for four years at the Defender Association of Philadelphia. I obtained my bachelor's degree in forensic psychology from Chatham University in Pittsburgh. In my prior role as a child advocate social worker with the City of Philadelphia, I interacted with all of the foster agencies in the City. I observed that some of the agencies offered high-quality services, and others

were at the other end of the spectrum. I observed that Catholic Social Services consistently was among the best of any foster agency in terms of the quality of services they provided, and they operated with the highest level of integrity, professionalism, responsiveness, and care.

3. I am now a foster parent myself, caring for two very young foster children who are biological siblings. I chose to work with Catholic Social Services because I observed their high-level care in the past, and because of my desire to raise my family with an organization that shared my religious beliefs. I am inspired by my religious beliefs to serve children, which is why I found my previous work as a child advocate so rewarding. I am continuing that religiously-motivated practice of serving vulnerable children now as a foster mother.

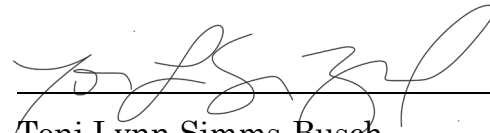
4. Fostering is often a very emotionally exhausting process, and I could not imagine continuing on this journey without the support I receive from Catholic Social Services. In my interactions with other agencies, I have not received this same level of personal care and loving encouragement. It is possible that in the future, a biological sibling of my foster children will need foster care, and I would be very open to fostering this child if I could work with Catholic Social Services. I am very open to fostering other children in need in the future as well.

5. If Catholic Social Services were forced to close its program, however, I think it is highly unlikely that I would be able to continue fostering. It would be devastating for me if I were no longer able to continue caring for foster children. It

would also be very disruptive for me and my family if I could no longer rely on Catholic Social Services.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2018.



Toni Lynn Simms-Buseh